

EXHIBIT 5

Kate White

From: Kate White
Sent: Wednesday, February 1, 2023 1:24 PM
To: 'Adams, Lisa (USATXE) 2'; Holley, Janet (USATXE); Madrigal, Patrick (USATXE)
Cc: Joe White; Matthew Cyran; Josh Welch; Amber Walker
Subject: RE: US v. Mercer 4:20CR212
Attachments: EASYSTORE DRIVE, recd 11.22.22.docx; SEAGATE EXPANSION DRIVE recd 12.07.22.docx

Ms. Adams,

We have received two productions from the USA the first on 11/22/2022 and the second on 12/07/2022. They did not have a cover letter or any accompanying documentation that indicated whether they were production 001, 002 or 003. We have identified the documents/information by file name/path link in the attached word documents that we have not been able to access. After you have a chance to review the attached, please let me know the best way to cure the accessibility issues. Also, please let me know what USA production number (001, 002 or 003) corresponds to each production we have received.

If you would like to discuss the attached, please feel free to call me at (405) 858-8899.

Thank you for your help,
Kate

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630 N.E. 63rd Street
Oklahoma City, OK 73105
(405) 858-8899
(405) 858-8844 FAX
kate@whiteandweddle.com
www.whiteandweddle.com

From: Adams, Lisa (USATXE) 2 <Lisa.Adams@usdoj.gov>
Sent: Wednesday, February 1, 2023 11:06 AM
To: Kate White <kate@whiteandweddle.com>; Holley, Janet (USATXE) <Janet.Holley@usdoj.gov>; Madrigal, Patrick (USATXE) <Patrick.Madrigal@usdoj.gov>
Subject: US v. Mercer 4:20CR212

Kate,

Per our conversation, please email the list of files you are having issues with and we will try to address those. Due to inclement weather it could be tomorrow afternoon before I can get back to you.

Thanks for calling us and letting us know of your problems.



Lisa Adams

Litigation Technology Specialist

Eastern District of Texas

United States Department of Justice

email: Lisa.Adams@usdoj.gov

phone: (469) 298-5415 | mobile: (214) 532-9226

United States Attorney's Office, 101 E. Park Blvd., Suite 500, Plano, TX 75074

EASYSTORE:

"D:\420CR212.1 US v. Mercer-Erwin\001_Production_ALL
DEFENDANTS\VILLAURRUTIA, Carlos Rocha\Aircraft Events - Individual Files\04-
N939RR aka XB-PVI\Cocaine Samples retrieved 10MAR2020" – EMPTY FOLDER

"D:\420CR212.1 US v. Mercer-Erwin\001_Production_ALL
DEFENDANTS\VILLAURRUTIA, Carlos Rocha\Aircraft Events - Individual
Files\N316JP\N316JP subscriber information on plane records ATT_M9-20-
58226_A46404868_46407257.txt"

RECD 12.07.22

SEAGATE EXPANSION DRIVE:

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\LI0004_SANDISK USB\IMAGE\SANDISK USB.E01"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\LI0004_SANDISK USB\IMAGE\SANDISK USB.E01.csv"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\LI0004_SANDISK USB\IMAGE\SANDISK USB.E01.txt"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\LI0008_RM_E_Desk3d\SANDISK Cruzeiro Glide\IMAGE\SANDISK CRUZER USB.E01"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\LI0008_RM_E_Desk3d\SANDISK Cruzeiro Glide\IMAGE\SANDISK CRUZER USB.E01.csv"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\LI0008_RM_E_Desk3d\SANDISK Cruzeiro Glide\IMAGE\SANDISK CRUZER USB.E01.txt"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\LI0019_RM_D_Desk1a\SANDISK USB Drive\DEVICE NOT INITIALIZED.txt"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MERCER_FILE COPY\2020\CCUR\DS_Store"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MOFFETT_FILE COPY\680KG\._smbdeleteAAA30000000248d3"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MOFFETT_FILE COPY\680KG\._smbdeleteAAA3000000024950"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\RM_K_IRWIN_iMAC_SDA\RM_K_IRWIN_iMAC_SDA.000"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\RM_K_IRWIN_iMAC_SDA\RM_K_IRWIN_iMAC_SDA.comp lete.log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_K_IRWIN_iMAC_SDA\RM_K_IRWIN_iMAC_SDA.log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_K_IRWIN_iMAC_SDA\RM_K_IRWIN_iMAC_SDA.log.h
ashes"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_K_IRWIN_iMAC_SDA\RM_K_IRWIN_iMAC_SDA.proce
ss.log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_K_IRWIN_iMAC_SDA\RM_K_IRWIN_iMAC_SDA.sourc
e_info"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_K_IRWIN_iMAC_SDA\RM_K_IRWIN_iMAC_SDA.verify
.log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_H_MERCER_iMAC_SDA\RM_H_MERCER_iMAC_SDA.
000"

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Erwin\AGC_DISCOVERY_1\RM_H_MERCER_iMAC_SDA\RM_H_MERCER_iMAC_SDA.
complete.log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_H_MERCER_iMAC_SDA\RM_H_MERCER_iMAC_SDA.
log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_H_MERCER_iMAC_SDA\RM_H_MERCER_iMAC_SDA.
log.hashes"

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Erwin\AGC_DISCOVERY_1\RM_H_MERCER_iMAC_SDA\RM_H_MERCER_iMAC_SDA.
process.log"

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Erwin\AGC_DISCOVERY_1\RM_H_MERCER_iMAC_SDA\RM_H_MERCER_iMAC_SDA.
source_info"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_H_MERCER_iMAC_SDA\RM_H_MERCER_iMAC_SDA.
verify.log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_H_MERCER_iMAC_NVME\RM_H_MERCER_iMAC_NV
ME.000"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_H_MERCER_iMAC_NVME\RM_H_MERCER_iMAC_NV
ME.complete.log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_H_MERCER_iMAC_NVME\RM_H_MERCER_iMAC_NV
ME.log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_H_MERCER_iMAC_NVME\RM_H_MERCER_iMAC_NV
ME.log.hashes"

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Erwin\AGC_DISCOVERY_1\RM_H_MERCER_iMAC_NVME\RM_H_MERCER_iMAC_NV
ME.process.log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_H_MERCER_iMAC_NVME\RM_H_MERCER_iMAC_NV
ME.source_info"

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Erwin\AGC_DISCOVERY_1\RM_H_MERCER_iMAC_NVME\RM_H_MERCER_iMAC_NV
ME.verify.log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_G_MOFFETT_SDA\RM_G_MOFFETT_SDA.000"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_G_MOFFETT_SDA\RM_G_MOFFETT_SDA.complete.log
"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_G_MOFFETT_SDA\RM_G_MOFFETT_SDA.log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_G_MOFFETT_SDA\RM_G_MOFFETT_SDA.log.hashes"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_G_MOFFETT_SDA\RM_G_MOFFETT_SDA.source_info"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_G_MOFFETT_SDA\RM_G_MOFFETT_SDA.verify.log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_F_EMILY_iMAC_SDA\Device Not Imaged.txt"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_E_DELL_T1700\SAMSUNG_SSD\IMAGE\DELL_T1700_
SAMSUNG_SSD.E01"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_E_DELL_T1700\SAMSUNG_SSD\IMAGE\DELL_T1700_
SAMSUNG_SSD.E01.csv"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_E_DELL_T1700\SAMSUNG_SSD\IMAGE\DELL_T1700_
SAMSUNG_SSD.E01.txt"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_D_NIKKI_iMAC_SDA\RM_D_NIKKI_iMAC_SDA.000"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_D_NIKKI_iMAC_SDA\RM_D_NIKKI_iMAC_SDA.compl
ete.log"

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Erwin\AGC_DISCOVERY_1\RM_D_NIKKI_iMAC_SDA\RM_D_NIKKI_iMAC_SDA.log"

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Erwin\AGC_DISCOVERY_1\RM_D_NIKKI_iMAC_SDA\RM_D_NIKKI_iMAC_SDA.log.ha
shes"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_D_NIKKI_iMAC_SDA\RM_D_NIKKI_iMAC_SDA.proces
s.log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_D_NIKKI_iMAC_SDA\RM_D_NIKKI_iMAC_SDA.source
_info"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_D_NIKKI_iMAC_SDA\RM_D_NIKKI_iMAC_SDA.verify.
log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_A_RECEPTION_iMAC_SDA\RM_A_RECEPTION_iMAC
_SDA.000"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_A_RECEPTION_iMAC_SDA\RM_A_RECEPTION_iMAC
_SDA.complete.log"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\RM_A_RECEPTION_iMAC_SDA\RM_A_RECEPTION_iMAC
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"D:\420CR212 US v. Debra Mercer-
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_SDA.verify.log"

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Erwin\AGC_DISCOVERY_1\MOFFETT_iPHONE\IMAGE\00008030-
00010C262691802E_keychain.plist"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\MOFFETT_iPHONE\IMAGE\00008030-
00010C262691802E_passwords.txt"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\MOFFETT_iPHONE\IMAGE\00008030-
00010C262691802E_pchistory.txt"

"D:\420CR212 US v. Debra Mercer-
Erwin\AGC_DISCOVERY_1\MOFFETT_iPHONE\IMAGE\00008030-
00010C262691802E_files_full.zip"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MOFFETT_FILE
COPY\550TW\._.DS_Store"

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"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MOFFETT_FILE COPY\724JK\724JK\WIRES IN & WIRES OUT - N724JK" – EMPTY FOLDER

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MOFFETT_FILE COPY\821TX\._.smbdeleteAAA1000000025500"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MOFFETT_FILE COPY\888SM\1st Escrow\._.DS_Store"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MOFFETT_FILE COPY\888SM\2nd Escrow\._.DS_Store"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MOFFETT_FILE COPY\888SM\2nd Escrow\._.DS_Store"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MOFFETT_FILE COPY\888SM\._.DS_Store"

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"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MERCER_iPHONE\IMAGE\00008030-001271222282802E_files_full.zip"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MERCER_iPHONE\IMAGE\00008030-001271222282802E_keychain.plist"

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"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MERCER_FILE COPY\2020\GOTHIC WIRE CONFIRMATION\..DS_Store"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MERCER_FILE COPY\2020\jonatan sredni\..DS_Store"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MERCER_FILE COPY\2020\MetroCity Holdings\..DS_Store"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MERCER_FILE COPY\2020\Slome, Ansel\..DS_Store"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MERCER_FILE COPY\2020\..DS_Store"

"D:\420CR212 US v. Debra Mercer-Erwin\AGC_DISCOVERY_1\MOFFETT_FILE COPY\\$\MfeDeepRem\USER_DATA" – EMPTY FOLDER

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\Guatemala\Cementos\Geologico – EMPTY FOLDER

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\Guatemala\Cementos\Legal – EMPTY FOLDER

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\Guatemala\Desarrollo Barrios\..DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\Guatemala\Desarrollo Barrios\..Polideportivo

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\Guatemala\Desarrollo Barrios\..Torre

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\Guatemala\Eddy\..DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\Guatemala\Eddy\..DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\Guatemala\Gaseoducto – EMPTY FOLDER

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\Guatemala\Social Houses\._DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\Guatemala\._DS_Store

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D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\Jade\._DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\Land\._DS_Store

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D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\Manati Tower\Torre Manati VIDEO REDES SOCIALES.mp4.webloc

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\Manati Tower\._DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\MDP\MDP Trading\._DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\MDP\New Labs Results – EMPTY FOLDER

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\MDP\Sales Contracts\._DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\MDP\Sales Contracts\._DS_Store

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D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\My Planes\B200\._DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\My Planes\Deals\._DS_Store

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D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\My Planes\Harrier\._DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\My Planes\Harrier\._DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\My Planes\N28FM\CAMP\._DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\My Planes\N28FM\CAMP\._DS_Store

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D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\My Planes\N28FM\Docs\._DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\My Planes\N28FM\Inspection Aug 2020\._.DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\My Planes\N28FM\Inspection Aug 2020\DS_Store

D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\My Planes\N28FM\Insurance\._.DS_Store

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D:\420CR212 US v. Debra Mercer-Erwin\MACHADO, Federico\Machado's Apple Computer.zip\Desktop\My Planes\N28FM\Maintenance\Duncan\._.DS_Store

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